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U.S. DISTRICT COURT N.D. OF ALABAMA

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FOR T	HE	NORTH	ERN DI	STRICT	OF	ALABAMA
		NORTH	EASTEF	RN DIVI	ISION	T

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Plaintiff,

v.

CASE NO.

SEQUIUM ASSET SOLUTIONS, LLC, AT&T MOBILITY, LLC, There may be other entities whose true names and identities are unknown to the Plaintiff at this time, who may be legally responsible for the claim(s) set forth herein and who may be added by amendment by the Plaintiff when their true names and identities are accurately ascertained by further discovery. Until that time, the Plaintiff will designate these parties in accordance with ARCP 9(h). The word "entity" as used herein is intended to refer to and include any and all legal entities including individual persons, any and all forms of partnership, any and all types of corporations or other partnerships, limited liability companies, etc. The symbol by which these parties defendants are designated is intended to include more than one entity in the event that discovery reveals that the descriptive characterizations of the symbol applies to more than on "entity." In the present action, the party Defendants which the Plaintiff must include by descriptive characterization are as follows: DEFENDANT A, and B, the correct designation of the person or entity known as or doing business as SEQUIUM ASSET SOLITIONS, LLC; DEFENDANTS C and D, the correct designation of the person or

entity known as AT&T MOBILITY, LLC,; all of whose true and correct names are otherwise unknown at this time, but will be added by amendment when ascertained;

Defendants.

DEFENDANT SEQUIUM ASSET SOLUTIONS, LLC'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Sequium Asset Solutions, LLC ("SAS") hereby removes the subject action from the Circuit Court of Limestone County, Alabama, to the United States District Court for the Northern District of Alabama, Northeastern Division, on the following grounds:

- 1. Plaintiff Christopher Hill instituted an action in the Circuit Court of Limestone County, Alabama, on August 18, 2020. A copy of the Complaint is attached hereto as **Exhibit A**.
 - 2. SAS was served with process on August 21, 2020. Therefore, removal is timely.
- 3. Plaintiff's Complaint alleges a violation of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. ("FDCPA").
- 4. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. §1331, as there is a federal question. This suit falls within the FDCPA which thus supplies the federal question.
- 5. Pursuant to 28 U.S.C. §1441, et seq., this cause may be removed from the Circuit Court of Limestone County, Alabama, to the United States District Court for the Northern District of Alabama, Northeastern Division.
- 6. Notice of this removal will be promptly filed with the Circuit Court of Limestone County, Alabama, and served on all adverse parties.

(W0669633.1)

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7. Pursuant to 28 U.S.C. §1446(a), copies of all process, pleadings, orders and other

papers filed in this action and obtained by Defendant are attached hereto and marked as composite

Exhibit B and incorporated herein by reference.

8. Plaintiff made a jury demand in state court.

9. Defendant AT&T Mobility, LLC was served with process on August 24, 2020.

AT&T Mobility, LLC consents to the removal of this action from the Circuit Court of Limestone

County, Alabama, to the United States District Court for the Northern District of Alabama,

Northeastern Division. See Defendant AT&T Mobility, LLC's joinder in and consent to notice of

removal, attached hereto as Exhibit C.

WHEREFORE, PREMISES CONSIDERED, Defendant Sequium Asset Solutions, LLC

removes the subject action from the Circuit Court of Limestone County, Alabama, to the United

States District Court for the Northern District of Alabama, Northeastern Division.

Dated: September 18, 2020

Respectfully submitted,

Neal D. Moore, III

L. Jackson Young, Jr.

Attorney for Defendant

Sequium Asset Solutions, LLC

OF COUNSEL:

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Defendant's Notice of Removal

{W0669633.1 }

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of September, 2020, I caused the foregoing to be electronically filed with the Clerk of the Court via Alafile, which will send a notice of electronic filing to all counsel and parties of record:

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OF COUNSEL TO THE